



U.S. Department of Justice

*United States Attorney
Eastern District of New York*

AFM/EHS/AA
F. #2022R00315

*271 Cadman Plaza East
Brooklyn, New York 11201*

July 2, 2024

By Email and ECF

The Honorable Frederic Block
United States District Judge
Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201

Re: United States v. Nicholas Ceraolo, et al.
Criminal Docket No. 23-236 (FB)

Dear Judge Block:

The government respectfully moves the Court to accept the defendant's plea in the above-captioned case. On May 30, 2024, the defendant Nicholas Ceraolo pleaded guilty before the Honorable Marcia M. Henry, United States Magistrate Judge, to Counts One and Two of the Indictment. See generally Plea Tr., attached hereto. The defendant allocuted that he joined a cybercrime group, Tr. 32, that he knew that a member of the group obtained and "used the username and password belonging to a law enforcement officer without that officer's knowledge or consent to gain access to a federal government database," and that he "shared the stolen credentials ... with others" in the cybercrime group, Tr. 33. Judge Henry found that the defendant was "competent," "acting voluntarily," that "he fully understands his rights and the potential consequences of his guilty plea," and that there "is a factual basis for the plea." Tr. 34. Finally, Judge Henry "recommend[ed] that the Court accept the defendant's plea of guilty to Counts One and Two of the indictment." Tr. 34.

Accordingly, by this letter, the government respectfully requests that the Court accept the defendant's guilty plea to Counts One and Two of the Indictment.

Respectfully submitted,

BREON PEACE
United States Attorney

By: /s/
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Enclosures

cc: Clerk of Court (by ECF) (FB)
Counsel of Record (by ECF)